

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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IN RE: CENTURYLINK SALES  
PRACTICES AND SECURITIES  
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:  
Civil File No. 18-296 (MJD/KMM)

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**JOINT STIPULATION REGARDING MODIFICATION OF THE SCHEDULING  
AND CASE MANAGEMENT ORDER**

The parties in the above-captioned matter hereby jointly stipulate to the following modification of the Scheduling and Case Management Order (“Scheduling Order”) as follows:

**WHEREAS:**

Under the Scheduling Order issued by the Court on October 16, 2019 (Dkt. 465), the substantial completion deadline for the production of documents was March 2, 2020, with the parties permitted to “agree to additional production following the deadline,” and the deadline to produce all privilege logs was April 15, 2020;

The parties previously agreed to additional productions under the Scheduling Order through May 2, 2020;

On February 29, Defendants’ vendor suffered a ransomware attack that paused Defendants’ document review and production capabilities until March 23, 2020;

Ongoing global events related to the spread of COVID-19 have introduced disruptions and uncertainty for the parties in this matter; and

All parties believe it is in the best interests of the Court and the parties involved that the Scheduling Order be modified in light of these events;

**THEREFORE:**

1. The parties stipulate to a modification of the Scheduling Order so that the substantial completion deadline for the production of documents is July 1, 2020, and
2. The deadline to produce all privilege logs is August 1, 2020.<sup>1</sup>

Dated: April 9, 2020

Respectfully submitted,

/s/ William A. McNab

William A. McNab, MN Bar No. 320924

Thomas H. Boyd, MN Bar No. 0200517

**WINTHROP & WEINSTINE, P.A.**

Capella Tower, Suite 35002

225 South Sixth Street

Minneapolis, MN 55402

Telephone: (612) 604-6400

Facsimile: (612) 604-6800

wmcnab@winthrop.com

tboyd@winthrop.com

Patrick E. Gibbs, CA Bar No. 183174

**COOLEY LLP**

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<sup>1</sup> In addition, at Your Honor's suggestion, the parties have met and conferred as to Plaintiffs' request that Defendants prioritize productions for nine custodians. The parties are in agreement that Defendants will make best efforts to review and, to the extent they are responsive and non-privileged, produce all documents in Defendants' review queue dated June 1, 2017 or later for these nine custodians by April 27, 2020, except for those documents that Defendants' document production model currently predicts are unlikely to be responsive.

3175 Hanover Street  
Palo Alto, CA 94304  
Telephone: (650) 843-5535  
Facsimile: (650) 618-0387  
pgibbs@cooley.com

Sarah M. Lightdale, NYS Bar No. 4395661  
**COOLEY LLP**  
55 Hudson Yards  
New York, NY 10001  
Telephone: (212) 479-6374  
Facsimile: (212) 479-6275  
slightdale@cooley.com

Douglas P. Lobel, VA Bar No. 42329  
David A. Vogel, VA Bar No. 48971  
Dana A. Moss, VA Bar No. 80095  
**COOLEY LLP**  
One Freedom Square / Reston Town Center  
11951 Freedom Drive  
Reston, Virginia 20190-5656  
Telephone: (703) 456-8000  
Facsimile: (703) 456-8100  
dlobel@cooley.com  
dvogel@cooley.com  
dmoss@cooley.com

Ryan Blair  
**COOLEY LLP**  
4401 Eastgate Mall  
San Diego, CA 92121  
Telephone: (858) 550-6047  
Facsimile: (858) 527-2750  
rblair@cooley.com

Jerry W. Blackwell (MN Bar No. 186867)  
**BLACKWELL BURKE P.A.**  
431 South 7th Street, Suite 25003  
Minneapolis, MN 55415  
Tel: (612) 343-3200  
Fax: (612) 343-3205  
blackwell@blackwellburke.com

*Counsel for Defendants*

**Keith S. Dubanevich**, OSB No. 975200  
**Timothy S. DeJong**, OSB No. 940662  
**Keil M. Mueller**, OSB No. 085535  
**Lydia Anderson-Dana**, OSB No. 166167  
**STOLL STOLL BERNE LOKTING & SHLACHTER P.C.**  
209 SW Oak Street, Suite 500  
Portland, OR 97204  
Telephone: (503) 227-1600  
Facsimile: (503) 227-6840  
kdubanevich@stollberne.com  
tdejong@stollberne.com  
kmueller@stollberne.com  
landersondana@stollberne.com

/s/ Michael D. Blatchley  
John C. Browne, NYS Bar No. 3922747  
Michael D. Blatchley, NYS Bar No. 4747424  
Michael Mathai, NYS Bar No. 5166319  
**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**  
1251 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 554-1400  
Facsimile: (212) 554-1444  
johnb@blbglaw.com  
michaelb@blbglaw.com  
michael.mathai@blbglaw.com

Richard D. Gluck, Cal. Bar. No. 151675  
**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**  
2121 Avenue of the Stars, Suite 2575  
Los Angeles, CA 90067  
Telephone: (310) 819-3470  
Facsimile: (212) 554-1444  
Rich.Gluck@blbglaw.com

*Special Assistant Attorneys General and  
Counsel for Lead Plaintiff the State of Oregon  
by and through the Oregon State Treasurer and  
the Oregon Public Employee Retirement Board,*

*on behalf of the Oregon Public Employee  
Retirement Fund, and Proposed Lead Counsel  
for the Class and Plaintiff Fernando Vildosola*

Richard A. Lockridge, MN No. 64117  
Gregg M. Fishbein, MN No. 202009  
Kate M. Baxter-Kauf, MN No. 392037  
**LOCKRIDGE GRINDAL NAUEN P.L.L.P.**  
100 Washington Avenue S, Suite 2200  
Minneapolis, MN 55401  
Telephone: (612) 596-4044  
Facsimile: (612) 339-0981  
ralockridge@locklaw.com  
gmfishbein@locklaw.com  
kmbaxter-kauf@locklaw.com

*Liaison Counsel for Lead Plaintiff the State of  
Oregon by and through the Oregon State  
Treasurer and the Oregon Public Employee  
Retirement Board, on behalf of the Oregon  
Public Employee Retirement Fund and Plaintiff  
Fernando Vildosola*

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